

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED WHOLESALE, LLC., an)	
Illinois Limited Liability Company,)	
)	
Plaintiff,)	
)	No. 11 C 02637
v.)	Judge: Robert Dow
)	Magistrate: Michael Mason
TRAFFIC JAM EVENTS, a Louisiana Company,)	
PLATINUM PLUS PRINTING, a)	
Minnesota Company, YOUR PREFERRED)	
PRINTER, LLC, a Louisiana Company.)	
)	
Defendants.)	

**MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS TRAFFIC JAM EVENTS AND
PLATINUM PLUS PRINTING**

Plaintiff, by its attorneys The Law Offices of Bryan T. Butcher, sets forth Plaintiff's Motion for Default Judgment against Defendants Traffic Jam Events and Platinum Plus Printing as follows:

1. Plaintiff filed an Amended Complaint on January 12, 2012 naming two additional Defendants to the originally filed action against Traffic Jam Events. *See Document #21.*
2. Defendant Traffic Jam Events filed an Appearance and Answer to Plaintiff's initial Complaint but has failed to file an Answer to Plaintiff's Amended Complaint.
3. Defendant Your Preferred Printer has Appeared, Answered, and been participating in this matter since service. Defendant Your Preferred Printer is the only Defendant who has appeared at Court status hearings and is currently engaged with Plaintiff in Jurisdictional Discovery relative to said Defendant's Motion to Dismiss on Jurisdictional grounds.
4. Defendant Platinum Plus Printing was properly served with the Amended Complaint and an attorney purporting to represent Platinum Plus Printing contacted Counsel for Plaintiff requesting time to file an Answer to the Amended Complaint. *See email communication Exhibit A.*
5. The last contact Plaintiff has had with either Platinum Plus Printing or Traffic Jam Events was in early April, 2012. Since that time, there have been two status hearings and this matter has been assigned to Magistrate Judge Mason for discovery supervision.

6. Plaintiff and Defendant Your Preferred Printer filed a Joint Status Report per Judge Mason's standing order, and appeared at the initial status conference on 6/21/12 to set a discovery schedule. Neither Defendant Platinum Plus Printing nor Traffic Jam Events appeared. Neither Defendant contacted the Court or Counsel as to why they could not participate.

7. Upon information and belief, Platinum Plus Printing and Traffic Jam Events have never appeared in Court to date.

8. Plaintiff's Amended Complaint was filed in January. In over 6 months, there has been no contact, no Answer, and no motion by either Defendant. The last communication Plaintiff has had with either Defendant was in Exhibit A attached. Said Defendants conduct can only be construed as intentional and prejudicial to Plaintiff's prosecution of this matter.

Wherefore, Plaintiff respectfully requests this Court enter a Default Judgment pursuant to Rule 55 (b)(2) against Defendants Platinum Plus Printing and Traffic Jam Events, and for any other relief this Court deems necessary and just.

Respectfully submitted,

s/Bryan T. Butcher
Attorney for Plaintiff

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